

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

DHD JESSAMINE, LLC,)	
)	
Plaintiff,)	Civil Action No.: 4:22-cv-01235-JD
)	
and)	
)	
WILLIAM D. TALLEVAST, V,)	
)	
Intervenor-Plaintiff,)	
)	
v.)	PLAINTIFF DHD JESSAMINE, LLC’S
)	DISCLOSURE OF EXPERT WITNESSES
FLORENCE COUNTY, SOUTH CAROLINA;)	UNDER RULE 26(a)(2), FRCP
FRANK J. BRAND; JASON SPRINGS;)	
ROGER M. POSTON; ALPHONSO)	
BRADLEY; JERRY W. YARBOROUGH;)	
STONE C. MOORE; WAYMON)	
MUMFORD; and WILLARD DORRIETY, JR.)	
as the elected members of)	
the FLORENCE COUNTY COUNCIL; and)	
JOHN DOES 1-15,)	
)	
Defendants.)	
)	

Plaintiff, DHD Jessamine, LLC, (“Plaintiff”), by and through its counsel, submits this disclosure of expert witnesses in accordance with Rule 26(a)(2), FRCP, who Plaintiff will or may call at trial in the above-captioned matter:

1. Professor Justin Steil, Ph.D.
MIT Department of Urban Studies and Planning
77 Massachusetts Avenue, Room 9-515
Cambridge, MA 02139
(617) 253-2017
steil@mit.edu

A. Qualifications and Background: Comprehensive information regarding Dr. Steil’s qualifications and background are set forth within his *curriculum vitae*, located at Appendix

A to his report, which is attached as Exhibit A to this filing. Dr. Steil, a lawyer and urban planner, is a recognized expert on land use law and housing policies, including affordable housing and housing discrimination and local governance and land use regulation.

B. Publications and Presentations Within Last 10 Years: A list of publications or presentations made within the last 10 years by this witness, as applicable, is included in his *curriculum vitae*.

C. Other Cases in which Witness has Testified at Trial or by Deposition during the Last Four Years: A list of cases and deposition in which Dr. Steil has provided testimony within the last four years is Appendix B to his report.

D. Statement of Compensation to be Paid: The schedule of fees and expenses charged for work conducted by Dr. Steil is \$ 300.00 per hour.

E. Statement of Opinions: Dr. Steil is expected to testify consistent with the contents of his written report, which is attached as Exhibit A, including but not limited to his opinions, to a reasonable degree of statistical certainty, that: (1) the Florence County Council's moratorium and related actions had a statistically significant adverse impact on the basis of race in making housing unavailable to Black South Carolinians; and (2) the Florence County Council's moratoriums and related actions perpetuated residential segregation on the basis of race, denying the potential residents of the affordable housing units (who would be predominantly Black) the benefits of living in a racially and economically integrated community.

2. Michael G. Barb, CPA
Barb & Company
1611 Devonshire Drive, Suite 100
Columbia, SC 29204
803-461-2493
mike@sc-cpa.com

Steve Riley, CPA, CFE
Barb & Company
1611 Devonshire Drive, Suite 100
Columbia, SC 29204
803-461-2493
steve@sc-cpa.com

A. Qualifications and Background: Mr. Barb is the Founder of Barb & Company, P.A. and is a Certified Public Accountant. He has been a practicing public accountant for 38 years. Before beginning his public practice, Mr. Barb previously worked for the IRS for 13 years. Mr. Riley is a shareholder a Barb & Company, P.A. He is a Certified Public Account and Certified Fraud Examiner. He has been a public accountant for 15 years. Comprehensive information regarding Mr. Riley's qualifications and background are set forth within his professional resume, which is attached as Exhibit B to this filing.

B. Publications and Presentations Within Last 10 Years: Not applicable.

C. Other Cases in which Witness has Testified at Trial or by Deposition during the Last Four Years: Not applicable.

D. Statement of Compensation to be Paid: The schedule of fees and expenses charged for work conducted by Mr. Barb and Mr. Riley is \$250.00 per hour.

E. Statement of Opinions: Mr. Barb and Mr. Riley are expected to testify consistent with the contents of their written report, which is attached as Exhibit C, which shall include their opinions as to the actual damages incurred by Plaintiff DHD Jessamine, LLC due to the obstruction of the affordable housing project, including but not limited to lost profits.

3. Additional Designations

Plaintiff also designates any experts designated by another party who are qualified to present testimony and who are not objected to at trial by Plaintiff and reserves the right to call the experts designated above or other experts for purposes of impeachment.

Plaintiff reserves the right to supplement this disclosure as discovery progresses, including but not limited to the depositions of any individuals yet to be deposed, and the receipt of additional records or information.

Respectfully submitted,

By: s/ J. Taylor Powell
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ATTORNEYS FOR PLAINTIFF

July 25, 2023
Charleston, South Carolina